

EXHIBIT "B"

PIKE & PIKE, P.C.
ATTORNEYS AT LAW

1921 Bellmore Avenue
Bellmore, NY 11710

Phone (516) 783-0062
Fax (516) 783-0082

Lincoln Limousine Brokerage, Inc.
19-23 Ditmars Blvd
Astoria, NY 11105

November 01, 2014

Matter Billing Summary

Re: 8862.001

LLB ads Leier

INVOICE #: 70107

Fees and Disbursements
Interest on Unpaid Balance

\$7,311.00

~~\$57.47~~

Total New Charges

\$7,368.47

Re: 8862.Dis

LLB Disb

INVOICE #: 70108

Fees and Disbursements
Interest on Unpaid Balance

\$66.78

~~\$4.46~~

Total New Charges

\$68.24

TOTAL DUE

\$7,436.71

\$7,377.78

ck# 1076
11/18/14

2000.00
\$5377.78

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Astoria, NY 11105

November 01, 2014

Re: 8862.001

LLB ads Leier

INVOICE #: 70107

Time Charges:

		<u>Hours</u>
9/26/2014	LIC Review records of jobs performed by plaintiff; office conference with RCP re: issues related to potential motion to dismiss.	0.40
9/29/2014	RCP Review and outline comments to status letter to client.	0.10
9/30/2014	LIC Revise and expand status letter to client.	0.20
10/1/2014	MTH Office conference with LIC. Review of file and organized letter motion documents as instructed.	0.20
	RCP Review and finalize status letter to client.	0.10
10/2/2014	MA Brief email to M. Almogazi enclosing LIC's October 2, 2014 correspondence re: status.	0.10
10/3/2014	LIC Appearance at US District Court in Brooklyn re: conference to discuss Plaintiff's request to file motion to strike Defendant's affirmative defenses; conference case with Court and Plaintiff's attorney; office conference with RCP re: denial of Plaintiff's request by Court.	3.90
10/6/2014	LIC Letter to client re: denial of Plaintiff's request to file motion to strike Defendant's affirmative defenses.	0.20
	RCP Review and finalize status letter to client.	0.10
	RCP Brief review and analysis of Plaintiff's discovery demands; memo to LIC re: same.	0.10
10/7/2014	MTH Brief conferences with LIC. Review of database for sample response to requests for admission as instructed. Prepared brief email to opposing counsel requesting attachments that were erroneously left out of Requests for Admissions.	0.30
	LIC Receipt and review of Plaintiff's discovery demands: legal research re:	0.50

PIKE & PIKE, P.C.

Lincoln Limousine Brokerage, Inc.

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November 01, 2014

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		<u>Hours</u>
10/8/2014	MTH Conference with LIC. Prepared deposition notice and draft responses to Plaintiff's discovery demands, as per attorney instruction.	0.90
	LIC Legal research re: [REDACTED]	0.30
10/9/2014	LIC Legal research re: [REDACTED]	1.40
	[REDACTED] prepare draft response to Plaintiff's request for Admissions.	
10/10/2014	RCP Review legal assistant's memo re: depos and reply; telephone conference with client re: status; review and analysis of Plaintiff's attorney's letter to Court for insight [REDACTED]	0.80
	[REDACTED] prepare memo to LIC.	
	LIC Review client documents for info for use in preparation of discovery demands.	0.40
10/13/2014	LIC Lengthy memo to RCP re: possible increased settlement offer; office conference with RCP re: same.	0.50
	RCP Conference with LIC re: issues related to possible new offer of judgment; conference with legal assistant for additional calculations in connection with same.	0.50
	CDD Office conf. with RCP & LIC. [REDACTED]	0.40
	[REDACTED] prepared email to RCP re total amount earned by Leier.	
10/21/2014	LIC Prepare draft responses to Plaintiff's discovery demands.	3.40
10/22/2014	MTH Brief conference with LIC. On-line research for specifications concerning vehicles in fleet. Prepared email to client requesting information concerning same.	0.60
	LIC Telephone conference with Plaintiff's attorney re: extension of time to serve discovery responses; office conference with RCP re: counsel's request to toll limitations period; revise and finalize draft discovery responses.	2.20
10/23/2014	MTH Brief conferences with LIC. Review of hard file and computer database for documents responsive to plaintiff's discovery demands. Compiled same for attorney review. Redaction of responses as instructed by attorney. Finalized all for LIC review and execution and served same upon opposing counsel via overnight mail.	0.80
	DK Assist MTH with compilation and redaction of exhibits for discovery demand.	0.50
	LIC Office conference with RCP re: discuss draft discovery responses; revise response to request for admissions, response to request for documents, and interrogatory responses.	5.20

PIKE & PIKE, P.C.

Lincoln Limousine Brokerage, Inc.

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November 01, 2014

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	<u>Hours</u>
10/23/2014 RCP Review and outline comments to Plaintiff's Demand for notice/commit; review ROG and D&I responses; modify and discuss with LIC; review documents to disclose.	2.20

Total time charges

26.30	\$7,311.00
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PLCH#1076
11/18/14 - 2000.00
\$ 5311.00

PIKE & PIKE, P.C.

Lincoln Limousine Brokerage, Inc.

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November 01, 2014

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Re: 8862.Dis

LLB Disb

INVOICE #: 70108

Disbursements:

9/30/2014	On line research provided by WestLaw, for the month of September, 2014 for file no.8862.001(LIC).	7.08
	Quarterly invoice for PACER (Public Access to Court Electronic Records, Invoice No. 2888382-Q32014-September 2014 for file no. 8862.001.	2.80
10/3/2014	Travel, tolls and/or parking (LIC) (8862.001 ads Leier).	26.50
10/23/2014	Copies of discovery responses for file 8862.001(MTH).	30.40

Total disbursements

\$66.78

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December 01, 2014

Matter Billing Summary

Re: 8862.001

LLB ads Leier

INVOICE #: 70403

Fees and Disbursements
Interest on Unpaid Balance

\$3,106.00

~~\$66.40~~

Total New Charges

\$3,172.10

Re: 8862.Dis

LLB Disb

INVOICE #: 70404

Fees and Disbursements
Interest on Unpaid Balance

\$206.18

~~\$0.60~~

Total New Charges

\$206.78

TOTAL DUE

~~\$3,378.88~~

\$3,312.18

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December 01, 2014

Re: 8862.001

LLB ads Leier

INVOICE #: 70403

Time Charges:

		<u>Hours</u>
10/29/2014 LIC	Prepare initial interrogatories and request for production of documents.	1.40
10/30/2014 LIC	Receipt and review of letter from plaintiff's attorney re: defendants' discovery responses.	0.20
10/31/2014 RCP	Review draft discovery demands.	0.20
11/3/2014 LIC	Memo to RCP re: [REDACTED]	0.20
11/6/2014 LIC	Letter to Plaintiff's attorney re: discovery issues.	0.20
RCP	Telephone conference with client re: various facts and issues.	0.20 NO CHARGE
11/7/2014 CDD	Finalized letter re defendants' discovery responses and repared emails to opposing counsel and client enclosing same.	0.20
11/11/2014 MTH	Brief conferences with RCP. Prepared email correspondence to client, forwarding Plaintiff's discovery demands, our responses, our demands and various correspondence to the Court, as instructed.	0.30
RCP	Organize notes/outline in prep for meeting with client; meet with client re: issues related to discovery and settlement.	1.80
LIC	Re: Lincoln ads Leier - Brief office conference with RCP and client re: Offer of Judgment.	0.20 NO CHARGE
11/13/2014 MTH	Brief conference with LIC. Revised Offer of Judgment as instructed and left same for attorney review, revision and execution.	0.20

		<u>Hours</u>
11/13/2014	LIC Office conference with MTH re: preparation of Offer of Judgment; legal research re: cases cited in Plaintiff's pre-motion letter regarding sufficiency of Defendant's discovery responses, and contrary authority; prepare draft response letter to Plaintiff's attorney.	2.70
	RCP Prepare detailed memo to LIC re: Offer of Judgment and supplementing discovery responses; review and outline comments to draft letter to counsel re: discovery responses; conference with LIC re: select issues related to same.	0.80
11/14/2014	MTH Forwarded copy of our letter regarding discovery responses to opposing counsel as instructed. Prepared brief email to client forwarding same along with a copy of revised Offer of Judgment.	0.40
	LIC Receipt and review of deposition notice.	0.20
11/17/2014	LIC Office conference with RCP re: deposition notice received from Plaintiff's attorney; review rules re: required advance notice; letter to attorney re: same.	0.40
	RCP Conference with LIC re: Plaintiff's notice of deposition and issues related to same.	0.20
11/18/2014	RCP Review and finalize letter to attorney re: depositions.	0.20
	RCP Prepare detailed email to client re: multiple issues; telephone conference with client re: same.	0.30 NO CHARGE
11/20/2014	LIC Office conference with RCP re: offer of judgment, scheduled deposition of Defendant, and related matters; telephone conference with opposing counsel re: rescheduling of Defendant's deposition and possible resolution.	0.40
	RCP Brief conference with LIC re: protective order motion re: deposition.	0.20 NO CHARGE
11/21/2014	MA Brief review of email from LIC; review of proposed dates provided by Plaintiff's attorney; brief review of conflicts; drafted letter to M. Almogazi.	0.30
11/25/2014	LIC Email correspondence with Plaintiff's attorney re: deposition date.	0.20
11/26/2014	MTH Receipt and review of attorney instructional note. Redacted email and customer information as instructed. Prepared draft Supplemental Response to accompany responsive documents, and drafted Certificate of Service of same, all for attorney review.	0.70
Total time charges		12.10 \$3,106.00

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Lincoln Limousine Brokerage, Inc.

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December 01, 2014

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Re: 8862.Dis

LLB Disb

INVOICE #: 70404

Disbursements:

10/23/2014	Overnight services provided by Unishippers, Invoice No. 1010143772 to T. Dickerson, Esq., dated 11-03-14 for file no. 8862.001(ads Leier)(MTH).	21.95
10/31/2014	Research provided by Lexis Nexis for the month of October, 2014, for file 8862.001 (ads Leier)(LIC).	26.95
11/30/2014	On line research provided by WestLaw, for the month of November, 2014 for file no. 8862.001 (ads Leier)(LIC).	157.28

Total disbursements

\$206.18

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Lincoln Limousine Brokerage, Inc.
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Astoria, NY 11105

December 11, 2014

Re: 8862.001

LLB ads Leier

INVOICE #: 70465

Time Charges:

		<u>Hours</u>
11/26/2014	RCP Review additional documents from client and memo to LIC re: same.	0.20 NO CHARGE
12/1/2014	RCP Prepare followup inquiry to client.	0.10 NO CHARGE
	RCP Lengthy telephone conference with client re: depos/settlement issue.	0.80
12/4/2014	LIC Multiple office conferences with RCP re: discovery issues and upcoming Court deadlines; telephone conference with Plaintiff's attorney re: same.	0.40
	RCP Review and analysis of client's [REDACTED] vis-a-vis certification issue; outline questions re: same.	0.20
	RCP Conference with LIC re: status with client; conference with LIC re: recent telephone conference with attorney.	0.20 NO CHARGE
12/7/2014	RCP Review and analysis of [REDACTED] compare with [REDACTED] brief initial review and analysis of Plaintiff's discovery responses.	0.50
12/8/2014	RCP Telephone call to Mohamed Almogazi	0.10 NO CHARGE
12/9/2014	MTH Brief conference with LIC. Forwarded copies of Discovery Demands and Plaintiff's Responses to client, via electronic mail, as instructed. Telephone call from Mr. Korban regarding same. Brief electronic mail message to RCP regarding client's concerns.	0.40
	LIC Receipt, review and analysis of Plaintiffs' motion to compel discovery responses.	0.40

Total time charges

3.30 \$785.50